

Date

Mr. Bryan Burns  
West 30's Redemption Company  
127 West Ruelle Dr.  
Mandeville, LA 70471

**Re: Louisiana Board of Ethics Docket No. 2022-011  
Advisory Opinion**

Dear Mr. Burns:

The Louisiana Board of Ethics, at its March 4, 2022 meeting, considered your request for an advisory opinion regarding whether the Code of Governmental Ethics ("Code") would prohibit your company, West 30's Redemption Company, from continuing to e-mail members of the Covington Board of Adjustment its quarterly newsletter.

**FACTS PROVIDED**

You stated that West 30's Redemption Company is a faith-based, nonprofit corporation engaged in the business of providing affordable housing for ownership by lower income families. The Chairman of the Covington Board of Adjustment stated to you that a conflict might exist when West 30's Redemption Company e-mails members of the Board of Adjustment its quarterly newsletter. You stated that a free newsletter is e-mailed to about 1,500 people, which may include members of the Board of Adjustment. The Chairman's concern is that from time to time West 30's Redemption Company appears in front of Board of Adjustment.

**ISSUE**

Whether the Code would prohibit West 30's Redemption Company from continuing to e-mail members of the Covington Board of Adjustment its quarterly newsletter.

**LAW**

**La. R.S. 42:1115** provides with respect to gifts:

B. No public employee shall solicit or accept, directly or indirectly, anything of economic value as a gift or gratuity from any person or from any officer, director, agent, or employee of such person, if such public servant knows or reasonably should know that such person:

(1) Conducts operations or activities which are regulated by the public employee's agency.

**La. R.S. 42:1102(22)(a)** defines "thing of economic value" as money or any other thing having economic value.

**ANALYSIS**

Section 1115 of the Code does not prohibit the e-mailing of a free newsletter to the members of the Covington Board of Adjustment. Section 1115 of the Code only prohibits public servants from accepting items with an economic value. The free newsletter has no economic value as defined in Section 1102(22) of the Code.

### **CONCLUSION**

The Board concluded, and instructed me to inform you, that the Code of Governmental Ethics would **not** prohibit West 30's Redemption Company from continuing to e-mail members of the Covington Board of Adjustment its free quarterly newsletter.

This advisory opinion is based solely on the facts as set forth herein. Changes to the facts as presented may result in a different application of the provisions of the Code of Governmental Ethics. The Board issues no opinion as to past conduct or as to laws other than the Code of Governmental Ethics, the Campaign Finance Disclosure Act, the Lobbyist Disclosure Acts, and the conflict of interest provisions contained in the Louisiana Gaming Control Law. If you have any questions, please contact me at (800) 842-6630 or (225) 219-5600.

Sincerely,

**LOUISIANA BOARD OF ETHICS**

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Suzanne Quinlan Mooney  
For the Board

**DISCLAIMER**  
This is a draft opinion and it is **NOT** an opinion of the Louisiana Board of Ethics. The analysis and conclusions herein are provided for discussion purposes only, and are subject to change or revision at the meeting of the Board of Ethics at which this matter is considered.